

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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ANTHONY DEO individually and as a shareholder/member
of NORTSHORE MOTOR LEASING LLC and 189
SUNRISE HWY AUTO LLC, SARA DEO individually
and as a shareholder/member of NORTSHORE MOTOR
LEASING LLC and NORTSHORE MOTOR LEASING,
LLC and 189 SUNRISE HWY AUTO, LLC,

Case No.: 24-cv-6903 (JMW)

Plaintiffs,

**DECLARATION OF JEFFREY
C. RUDERMAN IN SUPPORT
OF MOTION FOR
SUBSTITUTION OF COUNSEL**

-against-

RONALD BARON, JOSHUA AARONSON, JORY
BARON, MARCELLO SCIARRINO, DANIEL
O'SULLIVAN, BRIAN CHABRIER, WENDY KWUN,
IRIS BARON, RAYMOND PHELAN, ASAD KHAN,
ESTATE OF DAVID BARON, BARON NISSAN INC.
d/b/a BARON NISSAN, ISLAND AUTO GROUP OF
NEW YORK LLC a/k/a ISLAND AUTO GROUP OF
NY LLC a/k/a ISLAND AUTO GROUP, ROBERT
ANTHONY URRUTIA, BRUCE NOVICKY, MICHAEL
MORGAN, PARMESHWAR BISSOON, SUPERB
MOTORS INC. d/b/a TEAM AUTO DIRECT, RICHARDS,
WITT & CHARLES, LLP, CITRIN COOPERMAN &
COMPANY LLP a/k/a CITRIN COOPERMAN,
NEXTGEAR CAPITAL INC., ALLY FINANCIAL
INC., NISSAN MOTOR ACCEPTANCE COMPANY
LLC d/b/a NMAC, JP MORGAN CHASE BANK N.A.
a/k/a JP MORGAN CHASE & CO. a/k/a CHASE BANK
N.A. d/b/a CHASE BANK, CYRULI SHANKS &
ZIZMOR, LLP, MILMAN LABUDA LAW GROUP,
PLLC, JOHN DOE ATTORNEYS 1-20, JOHN DOE
ACCOUNTANTS 1-20, JOHN DOES 1-20, JANE
DOES 1-20, JOHN DOE CORPORATIONS 1-20,
and NEW YORK STATE DEPARTMENT OF
MOTOR VEHICLES,

Defendants.
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Pursuant to 28 U.S.C. 1746(2), Jeffrey C. Ruderman under hereby declares as follows:

1. I am a partner in the law firm of Cyruli Shanks & Zizmor LLP. I am an attorney admitted to practice in the Courts of the State of New York and am admitted to practice before this Court.

2. I respectfully submit this declaration pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York in support of the Stipulation and Order of Substitution of Counsel, which seeks to substitute Kaufman Dolowich LLP as counsel of record in place of Cyruli Shanks & Zizmor LLP for defendant Cyruli Shanks & Zizmor LLP in the above-captioned matter (the “Action”).

3. The reason for this substitution is that the Cyruli Shanks & Zizmor LLP, as defendants, have requested that Kaufman Dolowich LLP represent them going forward in the Action.

4. The substitution is on consent of outgoing counsel.

5. On September 4, 2024, Plaintiff filed a Verified Complaint in the Supreme Court of the State of New York, Nassau County, against defendant Cyruli Shanks & Zizmor LLP and the other defendants in the Action.

6. On September 30, 2024, the firm of Cyruli Shanks & Zizmor LLP, on its own behalf and other defendants it represented, removed the Action to this Court.

7. Defendant Cyruli Shanks & Zizmor LLP, and the other defendants it represents, have requested, and obtained, an Order of this Court granting them until December 2, 2024 to respond to the Complaint.

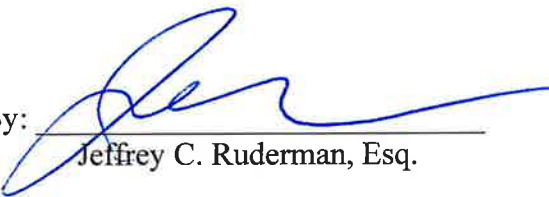
8. This Court has scheduled the Rule 16(b) conference for November 5, 2024 and the proposed Rule 26(f) discovery plan is to be filed by October 29, 2024. Some, but not all, defendants have appeared in the Action. No defendant has yet responded to the Complaint.

13. Incoming counsel will be prepared to file the proposed Rule 26(f) discovery plan by October 29, 2024, appear at the Rule 16(b) conference on November 5, 2024 and respond to the Complaint by December 2, 2024. It is not anticipated that the proposed substitution will cause any undue delay or in any way prejudice Plaintiffs in the Action.

14. Cyruli Shanks & Zizmor LLP, as counsel, will not be asserting any charging liens.

15. I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 21, 2024
New York, New York

By: 
Jeffrey C. Ruderman, Esq.